



1155 Avenue of the Americas
22nd Floor
New York, NY 10036-2711

T +1.212.262.6900
F +1.212.977.1649
PerkinsCoie.com

June 21, 2022

Adam R. Mandelsberg
AMandelsberg@perkinscoie.com
D. +1.212.261.6867
F. +1.212.399.8067

VIA CM/ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square - Courtroom 1106
New York, New York 10007

Re: *Jose Rodriguez v. Target Corporation*, Case No. 1:22-cv-02982 (LGS)

Dear Judge Schofield:

We write on behalf of Defendant Target Corporation (“Target”) with respect to the above-referenced action. Target respectfully submits this letter motion pursuant to Rule I(B)(2) of Your Honor’s Individual Practices to request that the Court adjourn the telephonic initial conference presently set for July 13, 2022, and all associated pre-trial deadlines. On June 13, 2022, counsel for Plaintiff Jose Rodriguez (“Plaintiff”) filed a First Amended Complaint (“FAC”). Pursuant to Federal Rule of Civil Procedure 15(a)(3), the deadline by which Target must respond to the FAC is June 27, 2022. Target anticipates responding via dispositive motion and is conferring with Plaintiff’s counsel on a proposed briefing schedule. Pursuant to Your Honor’s Rule III(C)(2), Target intends to file a pre-motion letter, including the parties’ proposed briefing schedule, on or before June 27, 2022 in anticipation of Target’s motion to dismiss the FAC.

Plaintiff’s counsel consented to the present request, which constitutes the second request for an adjournment or extension of time for the initial conference in this matter.

We thank Your Honor for your consideration.

Respectfully submitted,

Application DENIED.

/s/ Adam R. Mandelsberg
Adam R. Mandelsberg

Dated: June 21, 2022
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Hon. Lorna G. Schofield
June 21, 2022
Page 2

cc: All counsel of record